



Environmental Reviews Breakout Session

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Agenda – Housing

- ▶ Introductions
- ▶ Round 1 Status
- ▶ Lessons Learned
- ▶ Round 2 Expectations



Agenda – Infrastructure

- ▶ Lessons Learned
- ▶ Round 2.1



Round 1 Status – Housing

- ▶ Round 1 is currently on the downward slope and nearing completion. The decrease in environmental reviews is currently allowing GLO staff to review processes and procedures that can possibly be fine-tuned for the upcoming Round 2 housing funds.
 - Any future updates will be communicated as soon as they are finalized



Lessons Learned–Housing

- ▶ Councils of Governments, quasi-governmental entities, housing authorities, and non-Units of General Local Government **are not allowed** to sign for the Responsible Entity's Certifying Officer.
 - Only Units of General Local Government (cities and counties) and the State are allowed to sign as the RE's Certifying Officer (city mayor, city manager, county judge, county commissioner, GLO signatory, etc.) on HUD documents (Request for Release of Funds, Form 7015.15)



Lessons Learned–Infrastructure

▶ Floodplains, Wetlands, and the 8 Step Process

- The 8 step process must be done for impacts to floodplains AND/OR wetlands
- Documentation of completion of the 8 step process should be included in the ERR
- If a project is a critical action, as defined by 24 §55.2(b)(2), and within the 500 year floodplain, the 8 step process must be completed

▶ Public Notices

- A public notice guidance document and a visual illustrating required timelines are available on DashPort® ([Link to public notice guidance](#))
- RE should not sign the RROF until after the public comment period for the NOI has ended



Lessons Learned–Infrastructure

▶ THC Coordination

- The TDRA/SHPO Programmatic Agreement is not valid. A new GLO/SHPO Programmatic Agreement is currently under negotiation
- THC has requested that coordination requests be specific to the project area and not include a list of all cultural resources located within the county

▶ Appropriate resource agency coordination is required on all projects

- All coordination with an agency should be followed through until complete and either clearance is issued or a mitigation action is recommended



Lessons Learned–Infrastructure

- ▶ Sufficient research and detail for hazardous materials categories on the checklists is needed
 - ESP should provide analysis, conclusions and recommendations after completing the due diligence search
 - Conclusions and recommendations (e.g. Phase I ESA) of the analysis should be included and clearly summarized in the checklist(s)
 - ERRs for projects that require acceptable separation distance analysis, as described in 24 §51.2 Subpart C, need to include documentation that the analysis was completed
 - Additional hazardous materials guidance has been developed and is on DashPort® ([Link to guidance](#))



Round 2.1 Changes–Infrastructure

▶ ESP Contract

- The ESP contract will only include CE and EA projects
 - Any Exempt (EX) projects needed by grantees will be completed by the GLO, GAs or the grantee
- A CE, if requirements are met, will be able to convert down to an EX
 - This would include adding a Certification of Exemption form to the ERR and foregoing the NOI publication step of the CE process
 - ESP would receive the same fee (excluding expenses) for a CE as they would for a CE converted to EX
- Fees for both CE and EA projects might be adjusted, but the cost of publications will be reimbursed by GLO



Round 2.1 Changes–Infrastructure

▶ Process Change

- ESP work orders will not be issued until the 30% engineering design is submitted, reviewed, and accepted by the engineering team
 - This will help reduce the number of amendments and re-evaluation letters that have been needed during Round 1
 - It will allow projects in a bid package to directly correlate to an ERR (in most cases)
 - It will allow for supplemental agreements in response to addition of bid packages or amendments instead of new Work Orders
- All engineering work orders have been issued for Round 2.1 and design is currently underway



Round 2.1 Changes–Infrastructure

► Process Change

- All ERRs should be submitted for review prior to publishing the NOI–RROF or Combined FONSI/NOIRROF
- The RROF should not be signed by the RE until the NOI–RROF is published and the comment period has concluded
- All comments must be addressed and authorization given by the GLO/PMC prior to publishing the NOI
- Once the comment period is completed, the ERR should be submitted again and contain the proof of publication and signed RROF



Round 2–Housing

- ▶ Due to the recent transition from TDHCA to GLO, all tiered broad-level environmental reviews will be required to be prepared again for Round 2 funding.
- ▶ Any environmental reviews that didn't make the Round 1 funding deadlines and are planning to be assisted with Round 2 funds will be required to have all information updated on the Site Specific Checklists to reflect all recent changes (including dates for new AUGF, publications, etc).





Thank You Q & A

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